Appl. No. 10/042,967
Reply to Office Action of: March 29, 2007

REMARKS

Applicants would first like to thank Examiner Adhami for this thorough examination.

In the present application, Claims 1, 3-6, 8-11, and 13-18 are pending. In the Office Action of March 29, 2007, Claim 9 is objected to for informality, Claims 11-17 are rejected under 35 USC 101 as being directed to non-statutory subject matter. Claims 1, 3-6, 8-11, and 13-18 are rejected under 35 USC 112, first paragraph, as failing to comply with the enablement requirement. Claims 1, 3-6, 8-11, and 13-18 are rejected under 35 USC 112, first paragraph, as failing to comply with the written description requirement. Claims 1, 3-6, 8-11, and 13-18 are rejected under 35 USC 102 as being anticipated by Hong (US 204/0213233).

1. Objection to Claim 9 for Informality

Claim 9 is canceled. Accordingly, this objection is now obviated.

2. Claim Rejections - 35 USC 101

Claims 11-17 stand rejected under 35 USC 101 as being directed to non-statutory subject matter because they improperly claim a program of instruction. Claims 11-17 are canceled. Accordingly, this rejection is now obviated.

New claims 19-25 claim a computer program product comprising a computer readable media with program instructions recorded on said computer readable media.

3A. Claim Rejection – 35 USC 112, First Paragraph – Enablement

Claims 1, 3-6, 8-11, and 13-18 are rejected under 35 USC 112, first paragraph, as

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failing to comply with the enablement requirement. The Office Action argues that the method, system, and device of how a substitute filter is identified in Claims 1, 6, and 11 are not adequately disclosed. Claims 1, 3-6, 8-11, and 13-18 are canceled, obviating this ground for rejection. New claims 19-36 claim a program product, a system, or a method for substituting one of a plurality of pre-written filters for an existing filter specifically written to address specific circumstances of the network operation or avoid a problem with use of the router in the network including identifying one of a multiplicity of pre-written filters.

Claim 19 includes the feature "first program instructions to identify one of a multiplicity of pre-written filters which addresses the specific circumstances for which said existing filter was specifically written". Applicants respectfully contend that this feature is enabled. The specification of the present application provides support for the process of identifying a substitute pre-written filter at page 3, line 30 to page 4, line 25. This passage teaches that pre-written filters are written to address specific circumstances of the network operation, stating "As mentioned above, a filter will be written after a network is implemented in order to address specific circumstances of the network operation. Often, these specific filters are written by individuals who are not experts at writing filters. As a result, although the intended purposes of the filters may be highly desirable, the filters themselves may not be effective or may have adverse unintended consequences. Generally, in accordance with the present invention, a set of pre-written filters are provided, and a program is run on a computer to identify one of these pre-written filters as a substitute for the filter that is written specifically for the router." As explained in the foregoing passage, the specific circumstances of the network operation requiring a router filter are known from the specifically written filter. Thus, the process of identifying a substitute filter is carried out by searching a plurality of pre-written filters for one that addresses the specific circumstances of the network operation. This may be achieved in a number of ways as claimed in dependent claims 20-25 and supported in the specification. For example, features, intended functions, or problems which the specifically written filter

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all possible routing entries" and undisclosed reference "the routes kept from the previous topology are routes that match the specifically written filter) teach this limitation. As best understood, this argument suggests that the routes in the network topology are equivalent to the *pre-written filters*, the routes in the routing table before reconstruction are equivalent to *specifically written filters*, and that routes are kept from the previous topology because they match the specifically written filter (themselves).

First, the routes in a network topology are not equivalent to router filters. As provided in the specification, a router filter is a set of rules that determine how the router transmits data, such as determining the type or class of data or determining when, where and how to send the data. Conversely, the network topology, as shown in Hong, is merely an interconnection tree for a network showing all possible connecting routes within a particular flooding boundary. No rules for sending data are provided in the network topology.

Even if, arguendo, the routes in a network topology and the routes in a routing table were equivalent to router filters, Hong does not teach or suggest identifying one of a set of pre-written filters as a substitute for a specifically written filter. Rather, Hong adds or deletes routes to/from the routing table based on changes to the network topology. Thus, Hong teaches away from the present invention suggesting that all filters are specifically written for the network topology. Moreover, even if the routing table as a whole were, arguendo, equivalent to a router filter, reconstructing the routing table would suggest creating a new specifically written filter to replace a previous filter specifically written for a different network topology.

Further, Hong does not suggest or disclose identifying one of a set of pre-written filters. Rather, Hong teaches that the contents of the previous main routing table are deleted and contents of a sub-routing table constructed using the new network topology are stored in the main routing table (see paragraph 0063). Thus, if as the Office Action suggest, the routes in the routing table prior to reconstruction are the pre-written filters, then Hong teaches away from the present invention by deleting those pre-written filters.
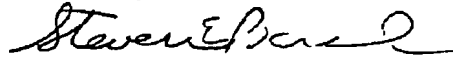
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Claims 20-25, 27-30, and 32-36 depend from claims 19, 26, and 31 and are allowable for the reasons, provided above, that claims 1, 6, and 11 are allowable.

Conclusion

In view of the forgoing amendments and remarks, Applicants respectfully contend that claims 19-36 are in condition for allowance. Accordingly, Applicants respectfully request entry of the foregoing amendments, examination and allowance of the claims, and issuance of letters patent for this invention.

Sincerely,

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